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Operating Company, LLC*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

TPOV ENTERPRISES 16, LLC, a Delaware  
Limited Liability Company,

Plaintiff,

vs.

PARIS LAS VEGAS OPERATING  
COMPANY, LLC, a Nevada limited liability  
company,

Defendant.

CASE NO. 2:17-cv-00346-JCM-VCF

**STIPULATION AND ~~PROPOSED~~ ORDER  
EXTENDING DEADLINE TO FILE  
REPLY IN SUPPORT OF  
COUNTERMOTION FOR PROTECTIVE  
ORDER**

**(FIRST REQUEST)**

PARIS LAS VEGAS OPERATING  
COMPANY, LLC, a Nevada limited liability  
company,

Counterclaimant.

vs.

TPOV ENTERPRISES, LLC, a Delaware  
Limited Liability Company, TPOV  
ENTERPRISES 16, LLC, a Delaware Limited  
Liability Company, Rowen Siebel, an  
individual.

Counter-defendants.

Pursuant to LR IA 6-1, Plaintiff/Counterdefendant TPOV Enterprises 16, LLC ("TPOV 16");  
Counterdefendant TPOV Enterprises, LLC ("TPOV"); Counterdefendant Rowen Seibel ("Seibel")  
(collectively, "Seibel and the TPOV Entities"); and Defendant/Counterclaimant Paris Las Vegas

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Operating Company, LLC ("Paris") (collectively, the "Parties"), by and through their undersigned counsel of record, stipulate and agree as follows:

1. On July 16, 2021, TPOV 16 filed a Motion to Compel Updated Financial Data (the "Motion to Compel"). (ECF No. 313.)

2. On August 13, 2021, Paris filed its Opposition to the Motion to Compel (ECF No. 322) and a Countermotion for Protective Order (the "Countermotion") (ECF No. 323).

3. On August 27, 2021, TPOV 16 filed its Reply in Support of the Motion to Compel (ECF No. 332) and its Response to the Countermotion (ECF No. 333).

4. Currently, the deadline to file a Reply in support of the Countermotion is September 3, 2021.

5. The Parties have agreed and respectfully request that the deadline to file a Reply in Support of the Countermotion be extended by seven (7) days to September 10, 2021, to allow Paris additional time to finalize the Reply.

6. This is the first request to extend time, is made in good faith, with good cause, and will not impact any other deadlines.

DATED this 3rd day of September 2021.

DATED this 3rd day of September 2021.

PISANELLI BICE PLLC

BAILEY KENNEDY

By: /s/ M. Magali Mercera  
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*Attorneys for Paris Las Vegas Operating Company, LLC*

*Attorneys for TPOV Enterprises 16, LLC, TPOV Enterprises, LLC and Rowen Seibe*

**ORDER**

IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE

DATED: 9-7-2021